

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,

Plaintiff,

v.

Case No. 3:23-cv-00018-RSB

**RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Defendant.

PLAINTIFF’S MOTION TO SEAL

Plaintiff Jane Doe, through undersigned counsel, moves this Court to permit her to file certain exhibits to her briefs in opposition to Defendant’s Motion for Summary Judgment (ECF No. 67) and Motion to Exclude Plaintiff’s Expert Andrew C. Verzilli (ECF No. 69) under seal pursuant to Local Rule 9. Plaintiff seeks to file records relating to the Title IX investigation that is the subject of this lawsuit, Plaintiff’s and Defendant’s discovery responses, and other discovery materials under seal. This Court should permit sealing of these exhibits because they contain highly sensitive information relating to sexual assault and sexual harassment and are also subject to regulations under the Family Educational Rights and Privacy Act (“FERPA”). Also, these records could be used to determine Plaintiff’s identity, as she is proceeding under a pseudonym. Defendant does not oppose the granting of this motion.

For these reasons, and as explained in more detail in Plaintiff’s Memorandum in Support filed contemporaneously with this Motion, under Local Rule 9 Plaintiff moves this Court to enter an Order permitting Plaintiff to file under seal certain exhibits in support of her briefs in

opposition to Defendant's Motion for Summary Judgment and Motion to Exclude Plaintiff's Expert Andrew C. Verzilli.

Dated: October 16, 2024

Respectfully submitted,

s/Elizabeth K. Abdnour

Elizabeth K. Abdnour

Pro Hac Vice

ABDNOUR WEIKER LLP

500 E. Michigan Ave., Suite 130

Lansing, Michigan 48912

Phone: (517) 994-1776

Fax: (614) 417-5081

liz@education-rights.com

Devon J. Munro (VSB # 47833)

Munro Byrd, P.C.

120 Day Ave. SW, First Floor

Roanoke, Virginia 24016

(540) 283-9343

dmunro@trialsva.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2024, a true and accurate copy of the foregoing document was filed using the Court's ECM/ECF filing system, which will send an electronic notification to all counsel of record.

s/ Elizabeth K. Abdnour

Attorney at Law